



June 23, 2005

VIA FAX – (601) 352-7757
and REGULAR MAIL
Ms. Betty Mallett
Mr. Rusty Fortenberry
McGlinchey Stafford PLLC
City Centre, Suite 1100
200 South Lamar St.
Jackson, MS 39201

Marcia Robinson Lowry
President &
Executive Director

Board of Directors
Alan C. Myers
Chairman & Treasurer
Robin L. Dahlberg
Secretary
Daniel H. Galpern
Jeffrey B. Gracer
Howard M. Maisel
Alice Rosenwald
Melissa G. Salen
Hershel B. Sarbin
Carol Wilson Spigner
Anne Strickland Squadron

Re: *Olivia Y. et al. v. Barbour et al.*

Dear Ms. Mallett and Mr. Fortenberry:

Please be advised that Plaintiffs will be rescheduling the depositions noticed for June 28 and 29, 2005, and several of those noticed for the month of July. Defendants have yet to produce requested documents necessary for those depositions and the Court has not yet ruled on Plaintiffs' motion to compel. I will send you a proposed modified deposition schedule that I hope we can agree on.

Plaintiffs also anticipate that the parties will need to agree on extending the CMO expert deadlines as a result of this delay and the delay in Plaintiffs' access to DHS class member case records pursuant to Plaintiffs' Second Request for Production of Documents. I hope to discuss this with you shortly as we establish the rest of the case record review schedule.

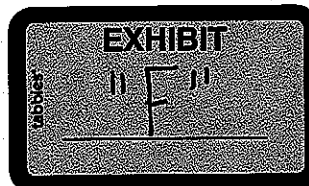
Sincerely yours,

Eric Thompson /gk

Eric Thompson
Counsel for Plaintiffs

cc: Wayne Drinkwater & Melody McAnally, Bradley Arant
Stephen Leech, Esq.
John Lang, Loeb & Loeb

404 Park Avenue South, New York, NY 10016
Tel: 212-683-2210 • Fax: 212-683-4015 • info@childrensrights.org • www.childrensrights.org





June 24, 2005

VIA FAX – (601) 352-7757
and REGULAR MAIL
Ms. Betty Mallett
Mr. Rusty Fortenberry
McGlinchey Stafford PLLC
City Centre, Suite 1100
200 South Lamar St.
Jackson, MS 39201

Marcia Robinson Lowry
President &
Executive Director

Board of Directors
Alan C. Myers
Chairman & Treasurer
Robin L. Dahlberg
Secretary
Daniel H. Galpern
Jeffrey B. Gracer
Howard M. Maisel
Alice Rosenwald
Melissa G. Salten
Hershel B. Sarbin
Carol Wilson Spigner
Anne Strickland Squadron

Re: *Olivia Y. et al. v. Barbour et al.*

Dear Ms. Mallett and Mr. Fortenberry:

Following up on my letter of yesterday, I enclose a proposed modified deposition schedule for the months of July and August that I hope we can agree on. You will notice that several previously noticed witnesses have been rescheduled for later dates or postponed pending receipt of documents. Other witnesses have been moved up to some of the previously noticed dates. Please let me know if the deponents can be made available on the proposed dates without requiring an amended notice of deposition.

Plaintiffs will also need to know whether Defendants' counsel will continue to represent departing DHS management staff such as Mr. Billy Mangold after their separation dates.

Thank you for your attention to these matters.

Sincerely yours,

Eric Thompson / gkc
Eric Thompson
Counsel for Plaintiffs

Encl.

cc: Wayne Drinkwater & Melody McAnally, Bradley Arant
Stephen Leech, Esq.
John Lang, Loeb & Loeb

July

<i>Sun</i>	<i>Mon</i>	<i>Tue</i>	<i>Wed</i>	<i>Thu</i>	<i>Fri</i>	<i>Sat</i>
				30	1	2
3	4	5	6	7	8	9
10	11	12 8:30 am Eva Beck Licenses, Forrest Cty. 1:30 pm Josie Brown SW, Forrest Cty.	13 8:30 am Deborah Stewart, ACSW, Forrest Cty. 1:30 pm Douglas Howard	14	15	16
17	18	19	20 8:30 am Martha McDaniel,	21 8:30 am Queen Coleman, ASWS Bolivar County (half day)	22	23
24	25	26	27	28	29	30
31						

2005

August

Mississippi

Sun	Mon	Tue	Wed	Thu	Fri	Sat
	1 8:30 am Sue Perry	2 8:30 am Billy Mangold	3	4	5	6
7	8	9 8:30 Zadie Rogers	10 8:30 Maggie Nixon	11 8:30 Gail Young	12	13
14	15	16 8:30 am Div. Dir. Program Integrity MDHS	17 8:30 am Reg. III Director	18 8:30 am Rickie Felder	19	20
21	22	23	24	25	26	27
28	29	30	31	1	2	3

2005